

NICHOLAS A. TRUTANICH
United States Attorney
District of Nevada

STACY WIESBROCK, California SBN 257920
Special Assistant United States Attorney
160 Spear Street, Suite 800
San Francisco, CA 94105
Tel: (415) 268-5612
Fax: (415) 744-0134
Email: Stacy.Wiesbrock@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MARLENE WATSON,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:18-cv-01019-JCM-PAL

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm in response to Plaintiff's Motion for Remand (Dkt. No. 19, filed on January 22, 2019), currently due on February 21, 2019, by 30 days, through and including Monday, March 25, 2019. Defendant further requests that all subsequent deadlines set forth in the Court's Order Concerning Review of Social Security Cases (Dkt. No. 16) be extended accordingly.

This is Defendant's first request for an extension of time to respond to Plaintiff's Motion for Remand. Defendant requests this extension because the matter was recently transferred to Defendant's attorney. Defendant also request this extension because of the heavy workload of

1 Defendant's attorney and to allow sufficient time to adequately research and prepare the issues
2 presented by Plaintiff in her motion. This request is made in good faith and with no intention to
3 unduly delay the proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
5 motion, on February 1, 2019.

6 It is therefore respectfully requested that Defendant be granted an extension of time to respond
7 to Plaintiff's Motion for Remand, through and including March 25, 2019.

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9 Dated: February 4, 2019

Respectfully submitted,

10 NICHOLAS A. TRUTANICH
11 United States Attorney

12 /s/ Stacy Wiesbrock
13 STACY WIESBROCK
Special Assistant United States Attorney

14 OF COUNSEL:

15 DEBORAH LEE STACHEL
16 Regional Chief Counsel, Region IX

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18 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

21 DATED: February 5, 2019
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1 **CERTIFICATE OF SERVICE**

2 I, Stacy Wiesbrock, certify that the following individual(s) were served with a copy of the
3 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** (*FIRST REQUEST*) on the
4 date, and via the method of service, identified below:

5 **CM/ECF:**

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7 Hal Taylor
223 Marsh Avenue
8 Reno, NV 89509
775-825-2223
9 Fax: 775-329-1113
Email: haltaylorlawyer@gbis.com

10
11 Melissa A. Palmer
Olinsky Law Group
300 S. State St., Ste. 420
12 Syracuse, NY 13202
315-701-5780
13 Fax: 315-701-5781
Email: mpalmer@windisability.com

14 Dated: February 4, 2019

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16 /s/ Stacy Wiesbrock
STACY WIESBROCK
17 Special Assistant United States Attorney
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